

JUDGE FRANK MONTALVO

FILED

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

2020 AUG 12 PM 12:54

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

SEALED  
BY

DEPUTY CLERK

UNITED STATES OF AMERICA,

Plaintiff,

VS.

SERGIO REYNA,

Defendant.

CRIMINAL NO.: EP-20-CR-

INDICTMENT

Ct. 1: 18 U.S.C. § 922(g)(1)  
Felon in Possession of a Firearm

Notice of Government's Demand For  
Forfeiture

THE GRAND JURY CHARGES:

**EP20CR1810**

COUNT ONE

[18 U.S.C. § 922(g)(1)]

On or about March 28, 2020, in the Western District of Texas, Defendant,

**SERGIO REYNA,**

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm (ammunition), to wit, an RG Industries, .38 caliber revolver, and two rounds of Aguila .38 Super caliber ammunition, and the firearm and ammunition had travelled in and affected interstate and foreign commerce, in violation of Title 18 U.S.C. § 922(g)(1).

NOTICE OF GOVERNMENT'S DEMAND FOR FORFEITURE

[See Fed. R. Crim. P. 32.2]

I.

Firearms Violation and Forfeiture Statutes

[Title 18 U.S.C. § 922(g)(1), subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1), as made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c)]

As a result of the foregoing criminal violation set forth in Count One, the United States of America gives notice to the Defendant **SERGIO REYNA** of its intent to seek the forfeiture of the

properties described below upon conviction pursuant to Fed R. Crim. P. 32.2 and Title 18 U.S.C. § 924(d)(1), as made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c). Section 924 states, in pertinent part, the following:

**18 U.S.C. § 924.**

**(d)(1)** Any firearm or ammunition involved in or used in any knowing violation of . . . section 922 . . . or knowing violation of section 924 . . . shall be subject to seizure and forfeiture . . . under the provisions of this chapter . . .

This Notice of Demand for Forfeiture includes but is not limited to the properties described below in Paragraph II.

**II.**

**Properties**

- 1. RG Industries, .38 caliber revolver, bearing serial number FF 382963;**
- 2. Two Aguila .38 super caliber ammunition, manufactured in Mexico; and**
- 3. Any and all firearms, ammunition, and/or accessories involved in or used in the commission of the criminal offense.**

**Substitute Assets**

If any of the property described above as being subject to forfeiture for the violations set forth above, as a result of any act or omission of the Defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States to seek forfeiture, pursuant to Title 21 U.S.C. § 853(p), as

incorporated by Title 28 U.S.C. § 2461(c), of any other property of said Defendant up to the value of the forfeitable property.

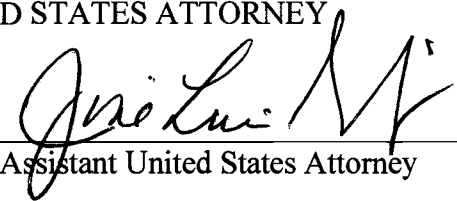
A TRUE BILL  
ORIGINAL SIGNATURE  
REDACTED PURSUANT TO  
E-GOVERNMENT ACT OF 2002  

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FOREPERSON OF THE GRAND JURY

JOHN F. BASH  
UNITED STATES ATTORNEY

BY:

  
Assistant United States Attorney